

**Peabody, Daniel (EGLE)**

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**From:** Saric, James <saric.james@epa.gov>  
**Sent:** Friday, May 6, 2022 9:39 AM  
**To:** Johnson, Shannon D  
**Cc:** Pauquette, Phil R; Draper, Cynthia E; Wood, Nicole; Hutchinson, Tom/DET; Gustavson, Karl; Peabody, Daniel (EGLE); Roberts, Keegan  
**Subject:** EPA Conditional Approval of Area 6 Water Quality Work Plan  
**Attachments:** A6 Water Quality Work Plan Conditional Approval.pdf

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Shannon,

Attached is EPA's conditional approval of the Area 6 Water Quality Work Plan. The document needs a few revisions, however you can proceed with field work.

Thanks

Jim Saric  
Remedial Project Manager  
US EPA Region 5, Chicago  
(312) 886-0992



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:  
SR- 6J

May 6, 2022

Mr. Shannon Johnson  
Georgia-Pacific LLC  
133 Peachtree Street NE  
Atlanta, Georgia 30303

RE: Operable Unit 5, Areas 6: Draft Water Quality Work Plan Conditional Approval  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Dear Mr. Johnson:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Area 6 draft Water Quality Work Plan, submitted on February 28, 2022, for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. The Water Quality work plan documents the proposed monitoring and sampling locations, rationale, and data collection procedures for surface water in Areas 5 and 6 to monitor water quality at an interim point of carp management activities. The Surface Water field investigation is scheduled for summer 2022.

EPA has enclosed comments on the Water Quality work plan, which require revision of the document. Therefore, EPA conditionally approves the Water Quality work plan pending receipt of a revised document adequately addressing EPA's comments. However, since the comments do not impact sampling locations and procedures, the field investigation can proceed as planned. The revised Water Quality work plan is due thirty (30) days after receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in cursive script that reads "James Saric".

James A. Saric  
Remedial Project Manager  
SEMD Remedial Response Branch #1

Enclosure

cc: Dan Peabody, EGLE

Bcc w/enclosure:

Nicole Wood, ORC

Tom Hutchinson, Jacobs

**U.S. EPA COMMENTS  
ON THE AREA 6  
WATER QUALITY WORK PLAN  
ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SITE**

**GENERAL COMMENTS**

**Commenting Organization:** EGLE

**General Comment #:** 1

Since the water quality parameters to be measured varies seasonally, revise the text to clarify if the proposed sampling period occurs over the same seasonal conditions as the 2019 baseline measurements, and whether there is a need for any seasonal adjustment of the data for comparison to the 2019 baseline conditions.

**Commenting Organization:** EGLE

**General Comment #:** 2

The text in sections 1.4 and 2.1 states that 'solids movement' will be estimated using the proposed sampling program. However, since the proposed program only includes measurements of turbidity, for clarity, revise the text to clearly state turbidity as the metric that will be used as a proxy for water column solids. Also revise the text to clarify if the measured turbidity will be used to estimate suspended sediment concentration.

**SPECIFIC COMMENTS**

**Commenting Organization:** EPA

**Commenter:** Gustavson

**Section:** 1.3.3                      **Page #:** 1-6

**Specific Comment #:** 1

If conclusions have not been made in the reports of the sampling efforts (where data are analyzed for these purposes), they should not be made and presented here in a work plan for water quality. The reference here is a 2021 workplan that has not yet been approved.

**Commenting Organization:** EGLE

**Section:** 1.4                      **Pages #:** 1-7

**Specific Comment #:** 2

Revise the two bullets in the section to rephrase term 'solids' as 'turbidity', consistent with the study goals in Section 1.6.2.

**Commenting Organization:** EGLE

**Section:** 1.5                      **Pages #:** 1-9

**Specific Comment #:** 3

Revise the text to clarify if the YSI EXO3 sondes measure salinity or conductivity.

**Commenting Organization:** EPA

**Commenter:** White

**Section:** 1.6.2                      **Page #:** 1-11

**Specific Comment #:** 4

The goal of the study should also include assessing differences in dissolved PCB concentrations measured using passive samplers.

**Commenting Organization: EPA**

**Commenter: White**

**Section: 1.6.3**

**Page #: 1-12**

**Specific Comment #: 5**

Information inputs should include the baseline passive sampler data set. The baseline data set is not described in Section 1.3 – will the 2022 passive sampler deployments use the same field and laboratory procedures to ensure that data are directly comparable? Will the 2022 passive samplers be deployed at the same time of year and for the same duration as the 2019 deployment?

**Commenting Organization: EPA**

**Commenter: White**

**Section: 1.6.5**

**Page #: 1-12**

**Specific Comment #: 6**

The analytic approach (and Section 3.1.3) is lacking in detail – what types of statistical evaluations will be performed? Also, it is not clear that the passive sampler data sets will be sufficiently robust for statistical comparisons.

**Commenting Organization: EPA**

**Commenter: Hutchinson**

**Section: Figure 1 (1-1)**

**Page #: Figure 1 (1-1)**

**Specific Comment #: 7**

Several specific landmarks/boundaries are referenced in Section 1.2 “Site Description” and the text then specifically references Figure 1-1. The following items are referenced in the text and should be included on the figure to assist the reader in identifying the specific locations: Trowbridge Dam, Allegan City Dam, Calkins Bridge/Lake Allegan Dam, Channelized Flow Area, Impounded Lake Area, Rossman Creek, Dumont Creek, M-89 Bridge, and Lake Allegan.

Also, the Figure is labeled Figure 1 – the text identifies the figure as Figure 1-1. Please make consistent.

Station 5 is discussed in the text and although there are no instruments deployed at Station 5, please indicate where it is located on Figure 1.